## Case 1:20-cv-00613-SB Document 430 Filed 04/05/23 Page 1 of 1 PageID #: 97207 Morris, Nichols, Arsht & Tunnell Llp

1201 NORTH MARKET STREET P.O. BOX 1347 WILMINGTON, DELAWARE 19899-1347

(302) 658-9200

MICHAEL J. FLYNN (302) 351-9661 mflynn@morrisnichols.com

April 5, 2023

The Honorable Stephanos Bibas United States District Court for the District of Delaware 844 North King Street Wilmington, DE 19801-3570 VIA ELECTRONIC FILING

Re: Thomson Reuters Enterprise Centre GmbH, et al. v. ROSS Intelligence Inc.,

C.A. No. 20-613 (SB) (D. Del.)

Dear Judge Bibas,

As requested at the discovery conference on March 28, I write to provide an update on the parties' efforts to resolve the source code issues discussed with the Court.

The parties have conferred on a proposed stipulation related to Plaintiffs' source code but have been unable to reach agreement about the scope of any such stipulation. In view of that impasse, Plaintiffs will make the relevant source code available for inspection consistent with the Protective Order entered in this case.

Respectfully,

Michael Flynn (# 5333)

MJF/rah

cc: All Counsel of Record (via electronic mail)